

EXHIBIT 2



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Contains Plaintiffs' CONFIDENTIAL Information

May 28, 2021

Via Email (aidan.skoyles@finnegan.com)

Aidan Skoyles, Esq.
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901 New York Avenue N.W.
Washington, DC 20001

**Re: *Japan Display Inc. [et al] v. Tianma Microelectronics Co. Ltd.*, Nos. 2:20-cv-283,-284, -285:
Plaintiffs' Discovery**

Dear Mr. Skoyles:

We write on behalf of plaintiffs Japan Display Inc. ("JDI" or "Plaintiff") and Panasonic Liquid Crystal Display Co., Ltd. ("PLD") (collectively, "Plaintiffs") pursuant to Paragraph 9 of the Discovery Order entered in the above litigations ("Actions"), in response to Tianma Microelectronics Co. Ltd.'s ("Tianma") letter of May 14, 2021 regarding purported deficiencies in Plaintiffs' discovery to date, and further to our meet and confer on May 26, 2021.

1. Technical Documents Regarding Plaintiffs' Products

Further to our meet and confer, our understanding is that Tianma's demand for technical documents regarding "all products Plaintiffs sell—past, present, and future" is in regards to Plaintiffs' potential lost profits damages theory. As we discussed, we disagree that the requested scope of discovery is relevant or proportional to the needs of the case. Regardless, Plaintiffs can confirm that they do not intend to proceed on a lost profits theory of damages. Plaintiffs will supplement their response to ROG No. 15 to reflect this confirmation.

With respect to Tianma's request for technical documents regarding certain of JDI's products that Tianma believes "may practice one or more of the patents and were sold before the priority dates for those asserted patents," we disagree that Tianma has met its P.R. 3-3 burden regarding the appropriate identification of the alleged prior art products, and has not otherwise supported its "belief" that such products are in fact prior art to any of the Asserted Patents. Regardless, subject to further objection, JDI will search for and produce or make available technical information regarding the following products identified by Tianma, to the extent they exist and can be located after a diligent search: